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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

VS.

SAMI ANWAR,  
MID COLUMBIA RESEARCH, LLC,  
ZAIN RESEARCH, LLC.

## Defendants.

Case No.: 4:18-CR-6054-EFS

## United States' Witness and Exhibit Lists for Sentencing Hearing

The United States of America, by  
States Attorney for the Eastern District  
and Tyler H.L. Tornabene, Assistant U.S.  
District of Washington, respectfully sub-  
List for Sentencing.

The United States intends to call one witness at the Sentencing Hearing: Diversion Investigator Craig Tom of the Drug Enforcement Administration. The United States intends to offer into evidence the below exhibits during the Sentencing Hearing. In order to keep the record clear, the exhibits for the Sentencing Hearing are numbered starting at 501:

<u>Ex. #</u>	<u>Admitted</u>	<u>Description</u>
501		ESD Overpayment Letter Bruinekool 7-27-2018
502		ESD Overpayment Letter to Bruinekool 10-2-2018
503		ESD Overpayment Statement to Bruinekool 1-7-2020
504		Image 0220- Texts between Yin and Bruinekool
505		Image 0221- Texts between Yin and Bruinekool
506		Image 0222- Texts between Yin and Bruinekool
507		Image 0223- Texts between Yin and Bruinekool
508		Image 1065- Photo of Pfizer Binder for Subject 1004
509		Image 1066- Photo of Pfizer Binder for Subject 1005
510		Image 1077- Photo of Pfizer Binder
511		Image 0379- Photo of Target with Bullet Holes
512		Image 0349- Photo of Note Re: WB
513		Photo of Phone Numbers
514		Photo Re: DK Binder
515		Photo Re: DK Death
516		Image 0167- Photo Re: Deportation

In addition, the United States may use exhibits, previously marked at trial, at the Sentencing Hearing. These include the following listed by their trial exhibit

1 number and whether or not they were admitted at trial, not admitted but stipulated  
 2 to, or neither admitted nor stipulated to (i.e. "Marked"):

<u>Ex. #</u>	<u>Admitted</u>	<u>Description</u>
105	Admitted	ICON Payments Spreadsheet for Cholesterol Study
125	Stipulated	Ledger of Payments
140	Admitted	Payment Spreadsheet for Smoking Study
277	Marked	Written Statement of Justina Bruinekool 1-24-2018
347	Admitted	Medpace Checks to Mid-Columbia Research
352	Admitted	Site Payment Spreadsheet for Braeburn Study
378	Stipulated	Letter from WA DOH to Bruinekool
379	Admitted	WA License Plate BDW1291
380	Admitted	Yin DOL Registration
381	Admitted	Text from Fernandez to Garduno
386	Marked	Richland PD Report Re: Bruinekool
401	Marked	Transcript of Bruinekool Unemployment Hearing
417	Admitted	DEA Chart- Deposits from Braeburn Medpace to MCR
418	Admitted	DEA Table- Sponsor payments to ZR and MCR
419	Admitted	DEA Table- Summary ZR Open Invoices
420	Admitted	Zain Research Open Invoices
421	Marked	DEA Table- Summary General Ledger ZR Report 2014

1	422	Admitted	PPT Slide Chart- Revenue Summary ZR MCR 2014-17
2	423a	Admitted	Email re H1 B Employer Information form
3	423b	Admitted	Email attachment- H1 B Documents ZMR
4	424	Admitted	H1 B Documents 2015 Zain Tax Return
5	425	Stipulated	Miscellaneous Income – For Taxes
6	426	Admitted	Zain 2014 GL Spreadsheet
7	429	Admitted	Keybank Records No. 7574
8	431	Admitted	Keybank Records No. 2175
9	432	Stipulated	Keybank Records No. 4371
10	433	Stipulated	Keybank Records No. 4371
11	434	Admitted	Keybank Records No. 4371
12	435	Admitted	Keybank Records No. 4371
13	436	Stipulated	US Bank No. 9512
14	437	Stipulated	US Bank No. 6396
15	444	Marked	Bruinekool Subject Names Email
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24 Per this Court's Notice Re: September 30th Sentencing Hearing (ECF No.  
25 231), the Court has set aside 45 minutes for the hearing. However, the United  
26 States has been advised that at least five individual victims may be present and  
27 may wish to address the Court. In addition, Diversion Investigator Tom's  
28 testimony is anticipated to be 45 minutes to an hour. Accordingly, between any

1 defense presentation and sentencing arguments, the United States respectfully  
2 requests that the Court set aside the morning for the Sentencing Hearing if  
3 possible.

4 RESPECTFULLY SUBMITTED this 23<sup>rd</sup> day of September, 2020.  
5

6 William D. Hyslop  
7 United States Attorney

8 s/Tyler H.L. Tornabene  
9 Daniel Hugo Fruchter  
10 Tyler H.L. Tornabene  
11 Assistant United States Attorneys

## **CERTIFICATE OF SERVICE**

I hereby certify that on September 23, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

John Gary Metro  
Attorney at Law  
719 Jadwin Avenue  
Richland, Washington 99352

s/ Tyler H.L. Tornabene  
Tyler H.L. Tornabene  
Assistant United States Attorney